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16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEW MEXICO

18 FRANKLIN GOMEZ CARRANZA and
19 RUBEN TORRES JAUREGUI,

20 Plaintiffs,

21 v.

22 UNITED STATES IMMIGRATION AND
23 CUSTOMS ENFORCEMENT, et al.,

24 Defendants.

Case No. 20-CV-424

**DECLARATION OF RUBEN TORRES
JAUREGUI IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

1 I, Ruben Torres Jauregui, declare as follows:

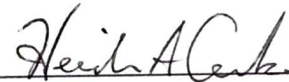
- 2 1. I make this declaration from my personal knowledge and, if called to testify to these
3 facts, could and would do so competently.
- 4 2. My name is Ruben Torres Jauregui. My A# is 201 933 594.
- 5 3. I am detained in Otero County Processing Center since August 2, 2019. I have a case
6 here and am waiting for my final hearing.
- 7 4. Since the beginning of COVID-19, my lawyer has not been able to visit me, or call
8 me. The little communication we have had was because my brothers help me and put
9 money in my account so that I can talk to her. Because we have to pay for phone calls
10 with ICE. Here on the inside, they don't make phone calls available for preparing my
11 case.
- 12 5. Each call costs 9 cents a minute. You can imagine how much I have spent to be able
13 to prepare for my hearing. But also, imagine those who don't have money to call their
14 lawyers. Here in my dormitory, there are men who have had to exchange their plate
15 of food and go without eating in order to be able to call their lawyer.
- 16 6. These are some of the things, and many more, that immigrants here suffer in Otero.
17 When I have to call my lawyer from the barracks, others hear my calls, they can
18 interrupt me, and it's difficult to hear on the phone.
- 19 7. I am going to live my whole life and die and I will never understand why there are
20 human beings, made of flesh and bone like us, that make us suffer so much.
- 21 8. I have never served as a class representative in any prior action.
- 22 9. I declare under penalty of perjury that the foregoing is true and correct to the best of
23 my knowledge.
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1 10. For reasons due to the COVID-19 pandemic shutdown, I am unable to sign this
2 declaration physically and I am executing this declaration on May 12, 2020 via my
3 attorney, Heidi Cerneka.

4 Ruben Torres Jauregui
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7 **Certificate of Interpretation**

8 I am the attorney representing Ruben Torres Jauregui in his asylum proceedings. On May 12,
9 2020, I met telephonically with Mr. Torres Jauregui and recorded and interpreted the above
10 Declaration of Ruben Torres Jauregui ("Declaration") from Spanish to English. Due to the
11 COVID-19 shutdowns and public health concerns, I was unable to physically meet with Mr.
12 Torres Jauregui for his signature for the Declaration. Mr. Torres Jauregui affirmed over the
13 telephone that the contents of his Declaration are true and accurate to the best of his knowledge.
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17 Heidi Cerneka, Esq.
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